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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES ex rel. JULIA LEE,)	No. C-00-2921 SBA
)	
Plaintiffs,)	STIPULATION EXTENDING FACT
)	DISCOVERY CUT-OFF AND ORDER
v.)	
)	
HORIZON WEST, INC., and HORIZON)	
WEST HEALTHCARE, INC., formerly)	
known as HORIZON WEST)	
HEADQUARTERS, INC.,)	
)	
Defendants.)	

Pursuant to Civil L.R. 6-2, and subject to the Court's approval, the United States of America, Relator Julia Lee, and Defendants Horizon West, Inc. And Horizon West Healthcare, Inc., hereby agree and stipulate to the following:

1 1. On December 14, 2005, the Court issued an Order for Pretrial Preparation setting the
2 following dates and deadlines:

3	Fact Discovery Cut-off:	August 31, 2006
4	Expert Discovery Cut-off:	September 29, 2006
5	Dispositive Motion Hearing Deadline:	November 14, 2006
6	Pretrial Conference:	December 12, 2006
7	Trial:	January 8, 2007

8 2. On April 6-7, 2006, the parties participated in private mediation with Mediator Gail
9 Killefer, and have since continued to negotiate with the assistance of Ms. Killefer. The
10 undersigned counsel for the parties have reached a proposed agreement on the major terms of a
11 settlement of this action, subject to approval by the Assistant Attorney General of the United
12 States, and subject to the execution of a written settlement agreement. The undersigned expect
13 to finalize the settlement within 30 days.

14 3. In an excess of caution, the Parties wish to extend the fact discovery cut-off by 29
15 days, to September 29, 2006, the same date as the expert discovery cut-off. This will allow the
16 parties to focus on finalizing the settlement, without fulfilling pending discovery obligations. In
17 the unlikely event that the settlement is not finalized, the Parties will have an additional 29 days
18 to complete fact discovery.

19 4. With respect to outstanding discovery obligations, the parties agree to the following
20 new dates and deadlines, if the settlement is not finalized by these dates:

21	Defendants' Responses to United States' First Request for Production:	May 31, 2006
22	Deposition of Joan Barlow:	June 19, 2006
23	Deposition of Sheila Waddell:	June 20, 2006
24	Deposition of Dennis Roccaforte:	June 21, 2006
25	Deposition of Sharon Donnelly:	June 22, 2006

26 5. There have been no previous time modifications to the case management schedule set
27 forth in the Court's December 14, 2005 Order for Pretrial Preparation.
28

IT IS SO STIPULATED.

DATED: _____ By: /s/
SARA WINSLOW
STEVEN J. SALTIEL
Assistant United States Attorneys

WARREN-BENSON LAW GROUP

HOOPER, LUNDY & BOOKMAN, INC.

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ORDER

Pursuant to stipulation, and for good cause shown, IT IS HEREBY ORDERED that the discovery cut-off for fact discovery is extended from August 31, 2006 to September 29, 2006. All discovery, including expert discovery, shall be completed and all depositions taken on or before September 29, 2006.

IT IS SO ORDERED. This 4th day of May, 2006.


SAUNDRA BROWN ARMSTRONG
United States District Judge